

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
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Stacy A. McCauley Cooney	:	Case No.: 18-13947-MDC
	:	
	:	
Debtor(s)	:	Chapter 13

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**MOTION TO MODIFY PLAN AFTER CONFIRMATION**

The Debtor, Stacy A. McCauley Cooney, by and through her undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about June 13, 2018.
2. The Chapter 13 filing was assigned case number 18-13947-MDC.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about June 13, 2019.
4. On or about March 22, 2020 the Debtor and the mortgagee, Nationstar Mortgage, LLC d/b/a Mr. Cooper entered into a Stipulation resolving the pending Motion for Relief.
5. Per the Stipulation, the Debtor is delinquent in the sum of \$4,022.66 in post-petition mortgage payments and attorney's fees and costs. A true and correct copy of the Stipulation is attached hereto as "**Exhibit A.**"
6. In accordance with the Stipulation, within thirty (30) days from the date that the Stipulation is approved by the court, Debtor will amend the Chapter 13 plan to include the remaining post-petition delinquency in the amount of \$4,022.66.

8. In furtherance of the Stipulation, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.

9. The Debtor's proposed modified Chapter 13 Plan is attached hereto as "**Exhibit B**", and is affordable to the Debtor.

**WHEREFORE**, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above-stated reasons.

Dated: March 25, 2020

/s/Brad J. Sadek, Esq  
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